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26 *Attorneys for Defendant Snap Inc.*

27 *Additional parties and counsel listed on
28 signature pages*

19
20 **UNITED STATES DISTRICT COURT**
21 **NORTHERN DISTRICT OF CALIFORNIA**
22 **OAKLAND DIVISION**

23 IN RE: SOCIAL MEDIA ADOLESCENT
24 ADDICTION/PERSONAL INJURY
25 PRODUCTS LIABILITY LITIGATION,

26 MDL No. 3047

27 Case No. 4:22-MD-03047-YGR-PHK

28 THIS DOCUMENT RELATES TO:
ALL ACTIONS

Honorable Peter H. Kang

**JOINT STATEMENT REGARDING
SNAP ACCOUNT DELETION ISSUE**

1 The parties wanted to ensure the MDL Court was aware of an account deletion issue that
 2 recently came to light with respect to Defendant Snap. Before the Thanksgiving holiday, Snap's
 3 counsel informed Plaintiffs' counsel in the MDL and JCCP proceedings that 262 accounts
 4 (impacting 102 plaintiffs, 28 in the MDL and 74 in the JCCP) were permanently deactivated and
 5 deleted. Snap is still investigating the issue to determine exactly what happened to these 262
 6 accounts (which were subject to litigation hold) and whether and to what extent user account
 7 information was impacted or destroyed. Snap has represented to Plaintiffs that "snapshots" were
 8 taken each of the 262 accounts and that these have been retained and were not impacted by the
 9 incident.

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- 11 • **Plaintiffs:** Plaintiffs believe that "snapshot" preservations do not contain all user data that
 12 would have been accessible through the accounts Snap permanently deactivated and
 13 deleted. Plaintiffs have requested that the snapshots be provided.
- 14 • **Snap:** Snap continues to investigate this issue, but based on preliminary investigation
 15 believes that the relevant information accessible through Snapchat accounts is preserved
 16 and has been retained in other forms. Snap has offered to provide the relevant information
 17 from the snapshots and has proposed a process for the parties to confirm the relevant
 18 accounts and make that exchange.

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20 Plaintiffs have sought a Rule 30(b)(6) deposition on this account deletion issue. Snap's
 21 counsel and Plaintiffs' counsel have been meeting-and-conferring on the issue, and Plaintiffs will
 22 provide Snap with proposed topics and timing for this deposition on December 12, 2023. The
 23 parties may seek the Court's guidance at the upcoming hearing and to address any dispute that
 24 arise.

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1 DATED: December 11, 2023

Respectfully submitted,

2 /s/ Rose Leda Ehler

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ATTESTATION

I, Rose Leda Ehler, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: December 11, 2023

/s/ Rose Leda Ehler

Rose Leda Ehler